

EXHIBIT A

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	Case No. CR 16-00462 CRB
)	
Plaintiff,)	DECLARATION OF ALEXANDRA
)	BRYANT IN SUPPORT OF THE
v.)	UNITED STATES' POST-HEARING
)	BRIEF REGARDING GAIN/LOSS
SUSHOVAN TAREQUE HUSSAIN,)	
)	
Defendant.)	
)	

I, Alexandra Bryant, state as follows:

1. I am a Special Agent with the FBI and have been so employed since 2017. I have been assigned to the San Francisco Division of the FBI since August 2017. As part of my assigned duties, I investigate possible violations of federal criminal law. Specifically, I am responsible for investigating complex financial crimes. I successfully completed the twenty weeks of New Agent Training at the FBI Academy in Quantico, Virginia in July 2017. During that time, I received training in physical surveillance, legal statutes and procedures, financial investigations, money laundering techniques, investigative procedures, asset identification, forfeiture and seizure, confidential source management, and electronic surveillance techniques,

1 including Title III monitoring. During my career with the FBI, I have received training in the
2 investigation of various types of fraud and the use of sophisticated investigative techniques. In
3 addition, I have participated in criminal investigations involving fraud and money laundering. I
4 am the case agent in the cases of *United States v. Sushovan Hussain*, and *United States v.*
5 *Michael Lynch and Stephen Chamberlain*.

6 2. The information contained in this Declaration is based primarily on my own
7 investigation and information discussed at the April 8, 2019 evidentiary hearing for Sushovan
8 Hussain.

9 3. Based on the trial record and documents produced to the government, on October
10 3, 2011, Sushovan Hussain gained approximately \$9.2 million USD from his sale of Autonomy
11 options and shares at £25.50 per share. This gain takes into account the cost of exercising the
12 options. If Hussain's gain was based only on the premium paid by HP (£25.50 - £15.58 =
13 £9.92), then Hussain gained approximately \$6.1 million USD on October 3, 2011.

14 4. Based on the trial record and documents produced to the government, on October
15 3, 2011, Michael Lynch gained approximately \$525.7 million USD from his sale of Autonomy
16 options and shares at £25.50 per share. This gain takes into account the cost of exercising the
17 options and the cost basis for the shares sold. If Lynch's gain was based only on the premium
18 paid by HP, then Lynch gained approximately \$315.8 million USD on October 3, 2011. Table A
19 below summarizes the government's gain calculation for Hussain, Lynch, and their combined
20 gain on October 3, 2011. It also includes the gain calculation suggested by the court where the
21 gain is based on the premium paid.

22 5. HP paid £25.50 per Autonomy share, which was a 64% premium over the August
23 17, 2011 price of £15.58. Put another way the premium HP paid per share was £9.92.

24 6. Based on the Cash Offer made by HP (trial exhibit 2307) there were
25 approximately 252.9 million Autonomy shares and options outstanding at the time of acquisition.

26 7. If the court is considering Hussain's gain to be the premium he received over the
27 August 17, 2011 price, then the loss to HP can similarly be calculated as the £9.92 premium paid
28 by HP for each of the 252.9 million Autonomy shares. The approximate premium paid by HP

resulting loss) would then be \$3.9 billion USD. Table B shows the calculation for this approximate premium paid by HP.

TABLE A

	Sushovan Hussain		Michael Lynch		Combined Gain		Exchange Rate Used
	Gain on Sale of Exercised Options and Shares Sold	Gain on Sale of Exercised Options and Shares Sold (USD)	Gain on Sale of Exercised Options and Shares Sold (GBP)	Gain on Sale of Exercised Options and Shares Sold (USD)	GBP	USD	
10/3/2011 - Acquisition at £25.50 share price	£6,008,072	\$ 9,271,657	£340,661,704	\$ 525,709,141	£346,669,776	\$ 534,980,799	1.5432
10/3/2011 - Acquisition based on the £9.92 premium	£3,960,798	\$ 6,112,304	£200,716,776	\$ 309,746,129	£204,677,574	\$ 315,858,433	1.5432

TABLE B

	Approx. cost to HP at £25.50 share price (GBP)	Approx. cost to HP at £25.50 share price (USD)	Approx. cost to HP at £15.58 share price (GBP)	Approx. cost to HP at £15.58 share price (USD)	Premium Paid by HP (GBP)	Premium Paid by HP (USD)	Exchange Rate Used
Total Shares and Options Purchased by HP (from Cash Offer - Trial Exhibit 2307) *	252,933,760	£6,449,810,880 \$ 9,953,348,150	£3,940,707,981	\$ 6,081,300,556	£2,509,102,899	\$3,872,047,594	1.5432

*243,469,433 shares and 9,464,327 Options

I declare under penalty of perjury that the foregoing is true and correct. Executed this 10th day of April 2019, in San Francisco, California.



ALEXANDRA BRYANT
Special Agent
Federal Bureau of Investigation